



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

EAG/JDG/CMP
F.#2008R00530

*271 Cadman Plaza East
Brooklyn, New York 11201*

March 5, 2012

By ECF and Fed Ex

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Re: United States v. Thomas Gioeli, et al.
Criminal Docket No. 08-240 (BMC)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes the following additional discovery in the above-captioned case.

<u>EXHIBIT</u>	<u>DESCRIPTION</u>
1431	Single excerpt of surveillance video taken at Torrese Social Club, 2005 West 8th Street, Brooklyn, New York on May 1, 1999, starting at 23:24, showing Thomas Gioeli and Joel Cacace
1432	New York City Police Laboratory photographs of two hair specimens: Top photo - Q1 (Carmine Gargano case) Bottom photo - Q24 (Ralph Dols case).

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<u>EXHIBIT</u>	<u>DESCRIPTION</u>
1433	Compact disc ("CD") containing surveillance photographs of Thomas Gioeli taken on February 15, 2008
1434	CD containing two intercepted wire communications over cellular telephone (347) 866-7921 (intercepted wire communications over this telephone, as well as the orders, applications and affidavits related to intercepted wire communications over this telephone were produced as discovery exhibit number 889 and 890)
1435	Digital video disc ("DVD") containing two excerpts of a surveillance video capturing Thomas Gioeli and others on November 8, 1995
1436a-d	Three DVDs (discovery exhibit numbers 1436a-1436c) containing a surveillance video capturing Thomas Gioeli and others on October 10, 2004 and a DVD (1436d) containing excerpts of that surveillance video
1437	DVD containing excerpts of the wedding video of Dino Calabro (the wedding video was previously produced as discovery exhibit number 964)
1438	Telephone records for 516-250-4752
1439	Certified death certificate for Paul Gulino
1440	Certified hospital records for Thomas Gioeli (the records were previously provided in discovery without a certification)
1441	Surveillance photographs taken November 3, 1997
1442	Ballistic report relating to the murder of Frank Marasa
1443	CD containing photographs taken at Mirage Night Club, Westbury, New York

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If you have any questions or requests, please contact us.

Sincerely,

LORETTA E. LYNCH
United States Attorney

By: /s/ Cristina M. Posa
Elizabeth A. Geddes
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Cristina M. Posa
Assistant U.S. Attorneys

cc: All Counsel (by ECF) (w/o enclosures)
Clerk of the Court (BMC) (by ECF) (w/o enclosures)